

# **EXHIBIT C**

**Kappler, David**

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**From:** Haefele, Robert  
**Sent:** Tuesday, February 6, 2018 4:51 PM  
**To:** 'Martin McMahon'  
**Subject:** RE: EXTERNAL-Re: Ltr to Martin McMahon 20180206.pdf

Martin – Thanks for the response and yes, please send me the license ASAP. It surprises me a bit that you learned about the license being granted only today. Even though I am not the license applicant, I received a call last Friday. I'd also add that I do not share your view of this as a collections matter. There is a sanctions order against your client, Mr. Jelaidan, in 03 MDL 1570. He would be violating a Court order if he were to NOT make the payment as directed. I suggest that Mr. Jelaidan (and though I am not sure, but possibly even you) may be put in a further difficult position if you and he were to decline to take any steps to comply with the order. Are you suggesting that neither you nor Mr. Jelaidan intend to take any steps to comply with the Court's order?

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
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**From:** Martin McMahon [mailto:[mm@martinmcmahonlaw.com](mailto:mm@martinmcmahonlaw.com)]  
**Sent:** Tuesday, February 6, 2018 4:12 PM  
**To:** Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>  
**Subject:** EXTERNAL-Re: Ltr to Martin McMahon 20180206.pdf

Dear Bob:

I did call into the Treasury earlier today and learned that the license had been issued. However, I wanted to inform you that I have no experience in terms of using that license to secure payment of fees. I'm not challenging the fact that there was an order issued by the magistrate providing for those fee awards. My problem is that I have secured a number of licenses in the past, but I needed to secure them so that I could represent a specially designated terrorist.

I have a question because I thought the money is located in Switzerland, but maybe I'm wrong about that. In any case, I don't see why your firm cannot take over this collection measure at this stage and I assume that it will be a lot of work involving Swiss attorneys if that's where the money is. FYI, Swiss courts are not exactly thrilled about working with Americans on the alleged War on Terrorism. They receive a lot of applications, but not a lot of hard facts proving that Mr. X is a terrorist. FYI, I have not yet received the license, but when I do I will fax the original to you. But again I ask, what is the issue with you taking over the collection measure at this stage?

As you know, I have not billed you for the time my firm has spent to secure that license, and it would appear to me that there would substantial legal fees incurred for anyone who tries to collect on that judgment. So, please get back to me with your insights on the matter.

Martin

On Tue, Feb 6, 2018 at 3:56 PM, Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)> wrote:

Marty – Please see attached correspondence regarding your client, Wa’el Jelaidan, and the sanctions previously imposed on him.

Regards,

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